

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

RYAN SCOTT KEANAANA,
PLAINTIFF
V.
WASHINGTON COUNTY JAIL,
NAPHCARE, INC.
DEFENDANTS

CASE NO. 3:21-CV-00741-IM

AMENDED COMPLAINT

CLAIM 1: I RYAN SCOTT KEANAANA, ALLEGE DEFENDANT WASHINGTON COUNTY JAIL (W.C.J) FAILED IN PART TO PROPERLY TREAT THE UNSANITARY CONDITIONS OF HOUSING WHILE IN THEIR CUSTODY, FROM 2018-2021.

ESPECIALLY BETWEEN 02/16/2019-02/28/2019 AND 04/04/2019-05/04/2019, WHEN HOUSED IN POD #3 CELLS 3-C32, 3-C53. THERE WAS BLOOD, FECES, URIN, MOLD, ROTTEN FOOD; UNCLEAN WALLS, FLOOR, SINK AND TOILET, FOOD SLUT, AND BEDDING.

PLAINTIFF SUFFERED SIMILAR ISSUES WITH OTHER PODS AND CELLS DURING THESE YEARS. WHILE HOUSED IN POD #3 CELL 3-C32 CONTRACTED "HEPATITIS B POSITIVE" AND "SCABIES"; SUFFERED FROM "HEMORRHOIDS," "GENITAL WARTS," PRIOR TO ENTERING CELL. DEVELOPED BREATHING ISSUES WHERE IT'S PAINFUL TO BREATHE, HYPERTENSION, SUFFERED MIGRAINES/HEADACHES, DRY/FLACKY SKIN FROM UNHEALTHY LIVING CONDITIONS.

PLAINTIFF VERBALLY REQUESTED PHOTOGRAPHS OF CELL 3-C32, WAS RIDICULED AND RETALIATED UPON BY DEFENDANTS W.C.J AND NAPHCARE STAFF. (VIDEO WILL REVEAL AT ONE POINT DEPUTY ROHMAN CHAPERONE WITH A NURSE (NAME?) OPEN CELL DOOR, HAVING PLAINTIFF

SIT ON BED WHILE SPEAKING, POINTING OUT ALL ISSUES; DEPUTY AND NURSE STATED THEY'LL LOOK INTO IT, CLOSED DOOR AND NOTHING HAPPENED - LATER PLAINTIFF RECOVERED FROM FLU OR COLD SUSTAINED BACK IN POD #7 CELL 7-C52 AS MEDICAL REQUEST FORM FILED SHOWS PLAINTIFF WAS ALREADY SEEKING MEDICAL ATTENTION PRIOR TO ENTERING POD #3 CELL 3-C32)).

POD #3 SGT. MONSON AFTER PLAINTIFF MADE SEVERAL REQUEST HAD DEPUTY HOLT PHOTOGRAPH CELL - FIRST SGT. MONSON ATTEMPTED TO MOVE PLAINTIFF OUT OF CELL AND NOT ALLOW PHOTOGRAPHING; PLAINTIFF HAS CIVIL RIGHTS, REQUESTED IT TO BE DONE AS PROOF, A BACK-UP PLAN, THAT CELL WAS PREVIOUSLY IN UNHEALTHY LIVING CONDITIONS ALONG WITH ALL DAMAGES, VANDELISM, WRITINGS, ETC. ALL DONE PRIOR TO BEING FORCED AGAINST OWN WILL BY DEPUTY DEZARN ON DUTY IN POD #7.

ON 02/16/2019 POD #7 DEPUTY DEZARN AT 4:30-5:00 AM, MOVED ME FROM POD #7 CELL 7-C52 OVER TO POD #3 CELL 3-C32 (POD #3 KNOWN AS - THE HOLE). DEPUTY FAILED TO CONDUCT A SAFE CELL SEARCH, USE INSPECTION CHECKLIST - POD #3 LIGHTS DIMMED DOWN, CORNER CELL IN DARK, ALSO TO UPON REQUEST PROVIDE MY PRESCRIPTION HEMORRHOID OINTMENT WITH MARKED PLASTIC CONTAINER AND LID. DEPUTY'S REASON WAS DUE TO NEEDING TO HURRY BACK FOR POD #7 BREAKFAST. POD #3 HAD A POD DEPUTY ON DUTY (NAME?) WHO FAILED TO HAVE CELL READY PRIOR TO BEING MOVED; POD SGT. MONSON FAILED HIS DUTIES, TRAINING, TO PROVIDE A SAFE AND HEALTHY CELL LIVING CONDITIONS.

THIS GOES AGAINST W. C. J. AND NAPH CARE POLICY STATEMENT, ORDINANCE, AND REGULATION. A DEPRIVATION ON ALL INVOLVED DECISION MAKING CHANNELS AS A GROUP; THEIR DELIBERATE INDIFFERENCE DEMONSTRATED VIOLATIONS TO MY CONSTITUTIONAL RIGHTS AS I SUFFERED INJURIES INFLICTED SOLELY BY THEIR EMPLOYEES.

1) A DELIBERATE INDIFFERENCE UNCLE DEPUTY FROM A SEPARATE POD #7 MOVED PLAINTIFF TO ANOTHER DEPUTY ON DUTY POD #3 (A SEPARATE POD SGT), TO FORCE PLAINTIFF INTO CELL AND FAIL TO PROVIDE PRESCRIPTION "HEMORRHOID OINTMENT";

2) FAILED TO MEET PROPER HEALTHY LIVING CONDITIONS, SAFETY STANDARDS, A DELIBERATE INDIFFERENCE;

3) DEPUTIES ON DUTY INCLUDING, POD SGT. MONBON, FAILED IN THEIR TRAINING, A DELIBERATE INDIFFERENCE;

4) A DELIBERATE INDIFFERENCE AS THERE'S NO WRITTEN PAPERWORK PROOF, NOR VIDEO SHOWING, DEPUTIES CONDUCTED A PROPER CELL CHECK-USE OF CHECKLIST (EXAMPLE: CHECKLIST USED DURING TRAINING, NEW DEPUTIES INSIDE PODS), WALK INTO CELL, VISUALLY CHECK, SEARCH OF UNHEALTHY LIVING CONDITIONS PRIOR TO PLACING PLAINTIFF INTO A CELL. FROM 02/16/2019-02/23/2019 NOT COMPLETED;

5) NAPHCARE NURSE'S WITH DEPUTY CHAPERONES ON ROUNDS INSIDE OF POD #3 FAILED TO REPORT, FILL OUT PAPERWORK, SPEAK OUT AND CONFRONT W.C.J AND NAPHCARE ON MEDICAL, MENTAL, AND DENTAL ISSUES POD #3 CELL 3-C32 CONTAINED. EXAMPLE: PLAINTIFF CONTRACTED "SCABIES", STRANGELY PRESCRIBED BY DR. JULIE RADOSTITZ TO TAKE 2 DOSES (NURSE WITH A DEPUTY CHAPERONE DID THIS TWICE! WHEN PLAINTIFF QUESTIONED "SECOND" DOSE OF "IVERMECTIN" - NURSE STANDING NEXT TO A DEPUTY CHAPERONE STATED IT WONT HURT TO TAKE "IVERMECTIN" "TWICE". BOTH NAPHCARE AND W.C.J, A DELIBERATE INDIFFERENCE WHILE STANDING SIDE-BY-SIDE OUT IN FRONT OF CELL;

6) PLAINTIFF'S MEDICAL PAPERWORK READS: "SECOND COURSE" OF TREATMENT "PODOFLOX" ON 04/01/2019, "ALSO, "THOUGH IT WAS "SCABIES" NOW RECEIVED "#2" TREATMENT WITH "IVERMECTIN" - NO CHANGE."

A DELIBERATE INDIFFERENCE.

NOTE: "PODOFLOX" EXTERNAL LIQUID Q-TIPS DIPPED INTO BOTTLES FOR "GENITAL WARTS" (START DATE OF ACTUAL "FIRST TREATMENT" WAS PRIOR TO 03/11/2019) CONDUCTED TWICE PER DAY, ONCE IN MORNING, 2-3 Q-TIPS, ONCE IN THE EVENING, 2-3 Q-TIPS, 3-4 DAYS PER WEEK, FOLLOWED BY 3-4 DAYS OFF; "HEMORRHOID OINTMENT" "FIRST TREATMENT" PRIOR TO 03/11/2019, POSSIBLE "METAMUCIL" "FIRST TREATMENT" PRIOR TO 03/11/2019. ALL ARE TO BE SHOWN BEING GIVEN TO PLAINTIFF ON POD(S) VIDEOS BY DIFFERENT NURSES USING ROLLING MED CARTS AND/OR A CARRYING RECTANGLE MED BOX.

7) LATER PLAINTIFF PRESCRIBED "NITROGLYCERIN OINTMENT", COMPLAINT FILED ON 04/01/2019 DUE TO IT CAUSING INFLAMMATION TO OPEN HEMORRHOID WOUNDS, ANAL FISSURES, LESIONS, BLEEDING HEMORRHOIDS THAT TRULY NEEDED ANTI-INFLAMMATORY TREATMENT; "NITROGLYCERIN" SEVERELY BURNED, CAUSED EXTREME PAIN, HEADACHE, VOMIT-PASSED OUT! A DELIBERATE INDIFFERENCE;

8) A DELIBERATE INDIFFERENCE WHEN NAPHICARE FAILS TO (WITHOUT HAVING PLAINTIFF REQUEST AND UPON REQUEST) ON THEIR OWN PROVIDE PRINTOUTS, PAPERWORK, OF ALL PRESCRIPTION MEDICATIONS SIDE-EFFECTS TO READ, OR ANY OTHER PRESCRIPTION MEDICATIONS INFORMATION;

9) PLAINTIFF'S LIFE PUT AT "HIGH-RISK" OR "PERMANENT BODY DAMAGE"; WHEN LISTED MEDICATION SIDE-EFFECTS WARN, CAUTION, BOTH NAPHICARE AND W.C. J WHO HOUSED PLAINTIFF ON SECOND FLOOR, FORCING TO MOVE UP AND DOWN 15 STEP STAIRS WHILE UNSERIOUS SIDE-EFFECTS MEDICATIONS. A HEALTH AND SAFETY ISSUE, A POTENTIAL ACCIDENT, A DELIBERATE INDIFFERENCE;

10) NAPHICARE CONDUCTING ROUTINE ROUNDS IN POD #3 (ALONG WITH OTHER PODS) FAILED TO PROVIDE PROPERLY FILLED OUT PATIENT MEDICAL PAPERWORK, HAD A LOT OF MISSING PAPERWORK, A DELIBERATE INDIFFERENCE;

11) NAPHICABLE, INC. - DR. JULIE RADOSTITZ'S FORCING, TRICKING, PLAINTIFF TO INCORRECTLY ELECTRONICALLY SIGN HIS SIGNATURE TO A NEW START DATE FOR HER OWN SIGNATURE'S PRESCRIBED PRESCRIPTION MEDICATIONS G.WENT TO PLAINTIFF PRIOR TO 03/11/2019 IS A VIOLATION TO CONSTITUTIONAL RIGHTS, A DELIBERATE INDIFFERENCE;

12) ON 04/04/2019 - 05/04/2019 PLAINTIFF PLACED INTO POD #3 CELL 3-C53 BY DEPUTY NOLI WHO DID NOT CHECK CELL NOR THE DEPUTY ON DUTY OR POD #3 SGT. MONSON. DEPUTY MCKELVEY CONFRONTED SGT. MONSON IN A MEETING AFTER PLAINTIFF COMPLAINED AND SHOWED HER CELL; NEXT SHE HAD 3-4 INMATE WORKER CREW WEARING FULL BODY SUITS WITH PROPER PROTECTIVE EQUIPMENT AND CLEANING MATERIALS PLUS DEVICES THOROUGHLY CLEAN BOTH SIDES OF POD #3 ALONG WITH ALL CELLS. DEPUTY NOLI, POD #3 DEPUTY ON DUTY (NAME?), POD #3 SGT. MONSON, A DELIBERATE INDIFFERENCE;

PLAINTIFF SUFFERED PAIN AND MENTAL ANGUISH, SUSTAINED PSYCHOLOGICAL ISSUES AS WELL. THESE UNSANITARY CONDITIONS AS DEFENDANTS WERE VIOLATING THE FOURTEENTH AND EIGHTH AMENDMENTS TO THE U.S. CONSTITUTION. BOTH DEFENDANTS FAILED TO TAKE REASONABLE MEASURES TO ABATE IT.

13) PLAINTIFF'S MEDICAL HISTORY WAS ALTERED, PAPERWORK WILL SHOW THAT DR. RADOSTITZ AROUND 02/16/2019 - 03/2019 STARTED TO CHANGE, SPEAK BAD/ILL, BECAME RUDE, BELITTLED, PUT WORDS IN PLAINTIFF'S MOUTH, LIE ABOUT PLAINTIFF IN HER TYPED REPORTS; THIS STARTED AFTER PLAINTIFF DISAGREED, TRIED TO CONFRONT, TO CONTEST NEW 03/11/2019 START DATE DECISION. DR. RADOSTITZ FORCE INTIMIDATED PLAINTIFF INTO SIGNING; A DELIBERATE INDIFFERENCE FOR HER OWN MISCONDUCTS AND UNPROFESSIONALISM.

NOTE: I HAVE MY NAPHICABLE PAPERWORK, VIDEOS, AND SEVERAL WITNESSES TO PROVE IT!; CLAIM 1.

CLAIM 2: AS A SAME TRANSACTION OF BEING IN CUSTODY FROM 05/2020 TO PRESENT 07/2021; DEFENDANTS WICJ AND NAPHICARE FAILED TO PROTECT, SAFEGUARD, PLAINTIFF FROM COVID-19 CONDITIONS, FAILED TO OFFER VACCINES BY 01/2021. FILLED OUT A MEDICAL REQUEST FORM - NAPHICARE WROTE I WAS SCHEDULED TO BE SEEN; NEVER HEARD BACK FROM NAPHICARE AGAIN - NEXT NAPHICARE, INC. LEFT FACILITY AND HAVE NOT RETURNED LEAVING PLAINTIFF BEHIND AND EMPTY.

PLAINTIFF WAS CLASSIFIED AS "HIGH-RISK" BY MARK BASKERVILLE OHSU DOCTOR FOR SEVERAL CONDITIONS FOR CATCHING COVID-19. SOME OF THOSE CONDITIONS BROUGHT UPON BY CLAIM 1. PLAINTIFF WAS PUT AT "RISK OF HARM," "RISK OF DEATH," BY THE DEFENDANTS UNWILLINGNESS TO FOLLOW STATE PROTOCOL FOR DEALING WITH COVID-19.

PLAINTIFF DEVELOPED THE SYMPTOMS FOR COVID-19 BUT WAS DENIED PROPER TESTING FOR THE SEVERAL COVID-19 MUTATING VIRUS VARIANTS. WICJ IGNORED, RIDICULED AND RETALIATED WITH WRITTEN STATEMENTS, VERBAL ABUSE. FROM THE START OF MAY 2020 JAIL OFFICIALS CONSTANTLY FAILED TO ENFORCE SOCIAL DISTANCING, PROPER MASK WEARING, ENFORCE MASK MANDATES OR KEEP INFECTED INMATES FROM HEALTHY ONES - STAFF "ACROSS ALL INSTITUTIONS" FAIL TO WEAR OR PROPERLY WEAR MASK! FAILED TO INCREASE TESTING, AND OTHER PRECAUTIONS IN THE JAIL KNOWN TO SLOW THE SPREAD OF COVID-19. THIS FOURTEENTH AND EIGHTEAMENDMENTS, VIOLATIONS, TO TREAT MY MEDICAL CONDITIONS PROPERLY, CAUSED PAIN AND SUFFERING, PSYCHOLOGICAL PROBLEMS - POST TRAUMATIC STRESS DISORDER, SUFFERED FROM FATIGUE "BRAIN FOG," TIGHTNESS IN CHEST CAUSING TO STUMBLE, HARD TIME BREATHING. SUFFERED FROM RASHES ON SKIN, BURNING LIPS, NOSE AND SKIN TEARS FROM MASKS SOAKED IN BLEACH AND OTHER LAUNDRY DETERGENTS (MAY 2020 - PRESENT 07/2021). PLAINTIFF HAD ONGOING SEVERE PAIN,

DIARRHEA, AND OTHER PHYSICAL ISSUES. ENTIRE STATE OF OREGON HAD AT LEAST OF 2020 SEVERE FOREST FIRES, ALL PODS AIR VENTILATION SYSTEM PUSHING OUT BLACK ASH AND SOOT, MIXED WITH HARMFUL CHEMICALS AND TOXINS, BURNED DEBRIS; DURING COVID-19 PANDEMIC TRYING TO COVER FACE TO BREATHE DID NOT WORK NOR WHEN WEARING COVID-19 MASK AS PODS VIDEO WILL SHOW DEPUTIES WITH MASK OFF OR PARTIALLY COVERING MOUTH WITH NOSE CUT, OR OFF HANGING ON ONE SIDE OF EAR. W.C.J KITCHEN VIDEOS SHOW KITCHEN STAFF (WITH TRINITY SERVICES GROUP, INC.) AND INMATE WORKER CREW (I.W.C) FROM MAY 2020 TO JULY 2020 DOING THE SAME MISCONDUCTS; KITCHEN STAFF NAME'S MRS. DIANNE, SILVIA, DEBBIE, A DELIBERATE INDIFFERENCE BY BOTH W.C.J STAFF AND OTHERS BY NOT OBEYING, FOLLOWING COVID-19 MASKS WEARING RULES.

CLAIM 3: AS A SAME TRANSACTION FROM BEING IN CUSTODY FROM 05/2020 - 07/2021 DEFENDANTS VIOLATED MY FOURTEENTH AND EIGHTH AMENDMENTS; WERE DELIBERATELY INDIFFERENT TO MY SERIOUS MEDICAL NEEDS AS PLAINTIFF WAS IN SOLITARY CONFINEMENT FOR 1 YEAR WELL PASS THE 15 DAYS ALLOWED TIME UNDER FEDERAL AND STATE LAWS. IT IS NOW MORE THAN 400 DAYS OF SOLITARY CONFINEMENT OF 21-24 HOURS PER DAY LOCKDOWNS IN CELLS.

PLAINTIFF IS BEING DENIED THE ABILITY TO EXERCISE, GET SUNLIGHT AND FRESH AIR, ATTORNEY CALLS, ABILITY TO CALL LOVED ONES, SOCIALIZE, RESEARCH JUDICIAL MATTERS, MAINTAIN AND SUSTAIN PROPER HYGIENE. PLAINTIFF SUFFERED PHYSICAL AND PSYCHOLOGICAL ISSUES, POST TRAUMATIC STRESS, MENTAL ANGUISH, SUFFERED WEIGHT ISSUE, PHYSICAL EXHAUSTION, TROUBLE BREATHING, VISION IMPAIRMENT, BLEEDING GUMS, HEARING LOSS, HAIR LOSS, HYPERTENSION, SHOULDERS AND HIPS PAIN, LOWER BACK LUMBAR

L1-L5 PAIN, HEMORRHOID PAIN, SWOLLEN ANKLES AND FEET, LOSS OF BLOOD CIRCULATION.

GRIEVANCE FILED ON "LIVING CONDITIONS" (POD #2 WITH DEPUTY RUIZ ON DUTY) IN REGARD TO DISFUNCTIONAL INTERCOM SYSTEM THAT CONTINUES TO BE UNRESOLVED AROUND PODS IN FACILITY.

CAUSES SEVERE MENTAL, PSYCHOLOGICAL ANGUISH DURING 21-24 HOURS SOLITARY CONFINEMENT LOCKDOWNS, LOUD VOLUME NOISES, STATIC PROJECTED OUT OF SPEAKERS IN PODS AND CELLS. POD #2 CELL 2-C31 HURTS EARS, CAUSING HEADACHES; MANY PODS HAVE HAD DEPUTIES SEND MAINTENANCE REQUEST AND NOTATED NOTES OF CONTINUED ONGOING PROBLEM. I HAVE ASIGNED PAPER FORM OF 50-60 POD #2 A.I.C.'S IN AGREEMENT OF UNFAIR TREATMENT 21-24 HOUR LOCKDOWNS WITH DISFUNCTIONAL INTERCOM SYSTEM - NO REMEDY, REMAINS AN ISSUE THAT IS UNRESOLVED.

RELIEF

CLAIM 1: MONETARY COMPENSATION FOR PAIN AND SUFFERING,
MENTAL, PSYCHOLOGICAL, PHYSICAL ANGUISH, AND CONDITIONS:
NAPHCARE \$250,000
W.C.T \$150,000; AND HAVE DEFENDANTS KEEP FACILITY
CLEAN TO SANITARY CONDITIONS.

CLAIM 2: MONETARY COMPENSATION FOR PAIN AND SUFFERING,
MENTAL, PSYCHOLOGICAL ANGUISH, AND CONDITIONS:

NAPHCARE \$35,000

W.C.I.J \$35,000; ALSO TO HAVE BOTH NAPHCARE AND W.C.I.J
CONDUCT BRONOSCOPY TESTING DONE FOR COVID-19 (WHERE THEY
TAKE TISSUE SAMPLES FROM LUNGS), MAINTAIN OR REGUN OHSA,
C.D.C GUIDELINES FOR COVID-19 REQUIREMENTS.

CLAIM 3: MONETARY COMPENSATION FOR PAIN AND SUFFERING,
MENTAL, PSYCHOLOGICAL, PHYSICAL ANGUISH, AND CONDITIONS:

W.C.I.J \$20,000

DATED THIS 1 DAY OF JULY, 2021.

SIGN: Ryan S Keenan

NAME PRINT: RYAN S KEENAN

PLAINTIFF PRO SE